

PRITCHARD

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Cr. No. 18-cr-20406-JTF
)	
vs.)	
)	
)	18 U.S.C. 241
ANTHONY DAVIS,)	18 U.S.C. 1951
SAM BLUE,)	18 U.S.C. 242
LESTER PAGE,)	18 U.S.C. 2
DAVID DOUGLAS,)	
RONNIE WOODS,)	
JARVIS HOWARD, and)	
KENNETH HICKS,)	
)	
Defendants.)	

SECOND SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

At all times material to this indictment:

1. Sam Blue was a sworn officer with the Memphis Police Department (MPD).
2. The MPD was a duly constituted police agency providing law enforcement services to the City of Memphis. Their sworn officers were authorized by law to make arrests and conduct searches and seizures.
3. The Grand Jury incorporates by reference and re-alleges these introductory allegations into each count of this indictment.

COUNT 1

Beginning at a time unknown to the grand jury, but at least from in or about January 2014 and continuing until on or about July 13, 2018, in the Western District of Tennessee and elsewhere, the defendants,

**ANTHONY DAVIS,
SAM BLUE,
LESTER PAGE,
DAVID DOUGLAS,
RONNIE WOODS,
JARVIS HOWARD, and
KENNETH HICKS**

did unlawfully, knowingly and intentionally conspire, combine, confederate and agree with each other, and with other persons both known and unknown to the Grand Jury, to, while acting under color of law, injure, oppress, threaten, and intimidate persons in the free exercise and enjoyment of rights secured to them by the Constitution and laws of the United States, that is, the right to be secure in their persons against harm, the right to be free from unreasonable searches and seizures, and the right to be free from deprivation of property without due process of law, by those acting under color of law, in violation of 18 U.S.C. §§241 and 2.

Included in the acts committed in violation of this Count is the kidnapping of Eric Cain on or about July 13, 2018.

MANNER AND MEANS

The conspiracy was to be accomplished in substance as follows:

1. Various co-conspirators would provide other co-conspirators with information about individuals (hereinafter "targets") believed to be in possession of narcotics or narcotics proceeds, knowing that the other co-conspirators would attempt to rob said

targets.

2. After receiving information about a particular target, various co-conspirators would share such information with other co-conspirators and discuss strategy with the other co-conspirators to commit a crime, that is to take property from the person and the presence of any victim, by using force, violence, and intimidation, thereby committing a robbery.

3. Prior to the planned robberies, various co-conspirators would conduct surveillance of the target(s).

4. Prior to the planned robberies, co-conspirator Blue would provide his civilian co-conspirators with information, such as home addresses for the target(s) of the robberies, obtained from law enforcement restricted sources.

5. Prior to the planned robberies, co-conspirator Blue would provide his civilian co-conspirators with equipment, including an official MPD badge, and a car dashboard blue light to use during the planned robberies so that they could falsely claim to be or appear to be law enforcement officers. Co-conspirator Blue would provide this equipment, and the co-conspirators agreed to use this equipment, to cause target(s) to believe the co-conspirators were carrying out legitimate law enforcement functions.

6. Prior to the planned robberies various co-conspirators would order official looking clothing to use during the planned robberies so that they could falsely claim to be or appear to be law enforcement officers and to cause target(s) to believe the co-conspirators were carrying out legitimate law enforcement functions.

COUNT 2

Beginning at a time unknown to the grand jury, but at least from in or about January 2014 and continuing until on or about July 13, 2018, in the Western District of Tennessee and elsewhere, the defendants,

**ANTHONY DAVIS,
SAM BLUE,
LESTER PAGE,
DAVID DOUGLAS,
RONNIE WOODS,
JARVIS HOWARD, and
KENNETH HICKS**

did unlawfully, knowingly and intentionally conspire, combine, confederate and agree with each other, and with other persons both known and unknown to the Grand Jury, to unlawfully obstruct, delay, and affect commerce and the movement of articles and commodities in such commerce, by robbery, and to commit and threaten physical violence to other persons, in furtherance of a plan and purpose to commit such robbery, in violation of 18 U.S.C. §§1951 and 2.

MANNER AND MEANS

1. The Grand Jury incorporates and re-alleges herein the allegations contained in the **MANNER AND MEANS** section of Count 1.

COUNT 3

On or about July 13, 2018, in the Western District of Tennessee, the defendants

**ANTHONY DAVIS,
SAM BLUE,
LESTER PAGE,
DAVID DOUGLAS,
RONNIE WOODS,
JARVIS HOWARD, and
KENNETH HICKS**

aided and abetted each by the other and by others known and unknown to the Grand Jury, while acting under color of the law, did willfully deprive a person of the right secured and protected by the Constitution of the United States not to be deprived of liberty without due process of law, including the right to be free from the intentional use of unreasonable force by one acting under color of law, all in violation of 18 U.S.C. §§242 and 2.

In commission of said offense, the defendants, aided and abetted each by the other and by others known and unknown to the Grand Jury, kidnapped Eric Cain.

A TRUE BILL:

FOREPERSON

DATED: _____

D. MICHAEL DUNAVANT
UNITED STATES ATTORNEY